IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BARBARA MOCEK, individually and
on behalf of all others similarly situated,

    Plaintiff,

        v.

ALLSAINTS USA LIMITED, a foreign
business corporation,

    Defendant.

Case No. 16-cv-8484

Hon. Elaine E. Bucklo

PLAINTIFF'S MOTION FOR REMAND TO STATE COURT

Plaintiff Barbara Mocek respectfully requests that the Court enter an Order remanding

this matter to the Circuit Court of Cook County, Illinois. Plaintiff's Motion is based upon her

Notice of Motion, the Memorandum of Law (and the exhibits attached thereto in support of the

Motion), and the record in this matter, along with any oral argument that may be presented to the

Court and evidence submitted in connection therewith at the presentment hearing.

WHEREFORE, Plaintiff Barbara Mocek, individually and on behalf of all others

similarly situated, respectfully requests that the Court enter an Order (1) remanding this case to

the Circuit Court of Cook County, Illinois; (2) denying defendant's motion to dismiss as moot;

(3) awarding plaintiff the fees incurred as a result of defendant's and its counsel's improper

removal; and (4) granting such further relief as this Court deems just and proper.

Respectfully submitted,

BARBARA MOCEK, individually and on behalf
of all others similarly situated,

Dated: October 10, 2016

By: /s/ Roger Perlstadt_____
    One of Plaintiff's attorneys

Benjamin H. Richman
brichman@edelson.com
Roger Perlstadt
rperlstadt@edelson.com
Courtney C. Booth
cbooth@edelson.com
Edelson PC
350 North LaSalle Street, 13th Floor
Chicago, Illinois 60654
Tel: 312.589.6370
Fax: 312.589.6378

1

CERTIFICATE OF SERVICE

I, Roger Perlstadt, an attorney, hereby certify that on October 10, 2016, I caused to be served the above and foregoing *Plaintiff's Motion for Remand to State Court* by causing a true and accurate copy of such paper to be filed and served on all counsel of record via the court's CM/ECF electronic filing system.

/s/ Roger Perlstadt